

EXHIBIT E

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12 CHUNGHWA PICTURE TUBES, LTD.

13 UNITED STATES DISTRICT COURT
14 FOR THE NORTHERN DISTRICT OF CALIFORNIA

15 IN RE: CATHODE RAY TUBE (CRT)
16 ANTITRUST LITIGATION,

CASE NO. 3:07-CV-5944 SC

DEFENDANT CHUNGHWA PICTURE
TUBES, LTD.'S RESPONSES AND
OBJECTIONS TO DEFENDANT LG
ELECTRONICS USA, INC.'S FIRST SET
OF REQUESTS FOR ADMISSION

17 This Document Relates To:

18 DIRECT PURCHASER ACTIONS and
19 INDIRECT PURCHASER ACTIONS

20 Pursuant to Rules 26 and 36 of the Federal Rules of Civil Procedure, Defendant Chunghwa
21 Picture Tubes, Ltd. ("Chunghwa") objects and responds to Defendant LG Electronics USA, Inc.'s
22 First Set of Requests for Admission ("Requests"). Chunghwa reserves the right to supplement the
23 responses set forth below.

24 **GENERAL OBJECTIONS**

25 Chunghwa incorporates the following General Objections into the specific Responses set forth
26 below. Chunghwa does not waive any of these General Objections in its Responses to the specific
27 Requests propounded. Any specific objection made by Chunghwa in no respect limits or modifies
28 these General Objections.

1 1. Chunghwa objects generally to the Requests to the extent they exceed the scope of
2 discovery permitted under the Federal Rules of Civil Procedure and the Local Rules.

3 2. Chunghwa objects generally to the Requests to the extent that they seek disclosure of
4 information subject to the attorney-client privilege, attorney work product doctrine, joint defense
5 privilege, or any other applicable privilege or protection available under any and all applicable laws.
6 Any inadvertent disclosure of privileged information shall not constitute a waiver of any otherwise
7 valid claim of privilege, and any failure to assert a privilege as to one document or communication
8 shall not be deemed to constitute a waiver of the privilege as to any other document or
9 communication so protected.

10 3. Chunghwa objects generally to the Requests to the extent that they seek information
11 containing or relating to trade secrets, proprietary, or confidential information protected by
12 constitutional, statutory or common law rights of privacy. *See, e.g.,* Cal. Const. art. I, § 1.

13 4. Chunghwa objects generally to the Requests to the extent that they seek information
14 that is not relevant to the claims or defenses of any party in these actions.

15 5. Chunghwa's responses are based on information known to Chunghwa at this time.
16 Chunghwa objects generally to the Requests as overbroad and impermissible to the extent that they
17 request admission of matters beyond the knowledge of Chunghwa. Chunghwa reserves the right to
18 supplement or amend its responses based on subsequently learned information.

19 6. Without limiting the generality of the foregoing objections, Chunghwa objects to the
20 definitions to the extent they purport to impose on Chunghwa obligations different from or beyond
21 those imposed by the Federal Rules of Civil Procedure and the rules and orders of the Court.

22 7. Chunghwa reserves all other objections, including but not limited to objections to the
23 relevance, admissibility, or authenticity of all information provided.

24 8. To the extent Chunghwa admits any request, the response should not be interpreted as
25 admitting anything other than the matter specifically stated in the request.

RESPONSES TO REQUESTS FOR ADMISSION

REQUEST FOR ADMISSION NO. 1:

Admit that Chunghwa is not aware of any agreement among Manufacturers or Sellers of CRT Finished Products, including any Defendants who are Manufacturers or Sellers of CRT Finished Products, concerning the prices at which any such Manufacturers or Sellers sell those Finished Products.

RESPONSE TO REQUEST FOR ADMISSION NO. 1

Chunghwa incorporates by reference its General Objections set forth above as though fully set forth herein.

Subject to and without waiver or limitation of any of its objections, Chunghwa responds as follows: Admit. Chunghwa notes that it is not and was not a Manufacturer or Seller of CRT Finished Products.

REQUEST FOR ADMISSION NO. 2:

Admit that Chunghwa is not aware of any conspiracy among Manufacturers or Sellers of CRT Finished Products, including any Defendants who are Manufacturers or Sellers of CRT Finished Products, to fix or set the prices at which any such Manufacturers or Sellers sell those Finished Products.

RESPONSE TO REQUEST FOR ADMISSION NO. 2:

Chunghwa incorporates by reference its General Objections set forth above as though fully set forth herein.

Subject to and without waiver or limitation of any of its objections, Chunghwa responds as follows: Admit. Chunghwa notes that it is not and was not a Manufacturer or Seller of CRT Finished Products.

REQUEST FOR ADMISSION NO. 3:

Admit that Chunghwa is not aware of any agreement among Manufacturers or Sellers of CRT Finished Products, including any Defendants who are Manufacturers or Sellers of CRT Finished Products, to reduce or limit the supply of those Finished Products.

1 **REPONSE TO REQUEST FOR ADMISSION NO. 3:**

2 Chunghwa incorporates by reference its General Objections set forth above as though fully set
3 forth herein.

4 Subject to and without waiver or limitation of any of its objections, Chunghwa responds as
5 follows: Admit. Chunghwa notes that it is not and was not a Manufacturer or Seller of CRT
6 Finished Products.

7 **REQUEST FOR ADMISSION NO. 4:**

8 Admit that Chunghwa is not aware of any agreement among Manufacturers or Sellers of CRT
9 Finished Products, including any Defendants who are Manufacturers or Sellers of CRT Finished
10 Products, to allocate customers, territories or markets for those Finished Products.

11 **RESPONSE TO REQUEST FOR ADMISSION NO. 4:**

12 Chunghwa incorporates by reference its General Objections set forth above as though fully set
13 forth herein.

14 Subject to and without waiver or limitation of any of its objections, Chunghwa responds as
15 follows: Admit. Chunghwa notes that it is not and was not a Manufacturer or Seller of CRT
16 Finished Products.

17 DATED: May 10, 2010

18 GIBSON, DUNN & CRUTCHER LLP
19 JOEL S. SANDERS
JOSHUA D. HESS

20
21 By: 
22 Joel S. Sanders

23 Attorneys for
24 CHUNGHWA PICTURE TUBES, LTD.
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VERIFICATION

I, S.J. Yang, am Vice President of Chunghwa Picture Tubes, Ltd. and am authorized to make this verification on behalf of Chunghwa Picture Tubes, Ltd., Inc. I have read the attached Defendant Chunghwa Picture Tubes, Ltd.'s Responses and Objections to Defendant LG Electronics USA, Inc.'s First Set of Requests for Admission and know its contents. I am informed and believe that the matters and things stated therein are true.

I verify under penalty of perjury that the foregoing is true and correct.

Executed this 6 day of May, 2010, at Chunghwa Fuzhou.

S. J. Yang

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